



United States Department of Justice

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January 23, 2018

Hon. Norman A. Mordue
Senior U.S. District Court Judge
Federal Building and U.S. Courthouse
Syracuse, New York 13261

Re: *U.S. v. Andrew Raymond and Brian Requena*
Docket No.: 5:15-CR-081

Dear Judge Mordue:

The government writes this letter to respectfully request an extension of time by which it must file its proposed findings of fact and memorandum of law regarding the sentencing hearing that was held before this Court on December 19, 2017. Following the hearing, your Honor ordered that the government and defendants submit their respective findings of fact and memoranda of law on or before February 2, 2018. The government respectfully requests that all parties be given until March 2, 2018, to file their briefs.

The government makes this request based on its current case workload which has, thus far, prevented the undersigned from being able to thoroughly review the sentencing hearing transcript and begin to draft its findings of fact and memorandum of law regarding the issues before this Court, i.e. determining the "Drug Equivalencies," pursuant to U.S.S.G. §2D1.1, application notes 6 and 8, for the six (6) controlled substance analogues listed in the indictment

In light of the above circumstances, the government is respectfully requesting that all parties be granted an extension to file their respective briefs on or before March 2, 2018.

Thank you for your consideration in this matter.

Very truly yours,

GRANT C. JAQUITH
United States Attorney

By: /s/ Carla Freedman
Carla Freedman
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